

Exhibit 1



From: Zhao, Yanan
Sent: Thursday, July 27, 2023 7:04 PM
To: 'Park, Ryuk'; Zhong, Annita; Rueckheim, Mike; Sheasby, Jason
Cc: Winston-Micron-Netlist; Wesley Hill; #Netlist-Micron [Int]; Jennifer Truelove (jtruelove@McKoolSmith.com)
Subject: RE: Lead Counsel Meet and Confer
Attachments: RE: Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) - Improperly Withheld Documents

Ryuk,

My last email on this topic was from July 18, here attached. You have not provided a list of the file names and file types that you previously characterized as "Certain technical documentations for HBM2E and HBM3" but have not been produced in this Action. You still have not explained why Micron believes they can only be produced as source code. And even with respect to the documents Micron agreed to produce, we have not received any production from you.

During our last meet and confer on 30(b)(6) deposition designations, I followed up on the source code material issue at the end. You stated that Dr. Barr can come to Idaho and review the source code materials this week, and then raise this issue if he identified any improperly designated materials. This is exactly what we did, and now we ask Micron to explain its basis to designate these technical documents as Source Code Materials. The majority of these documents have no information "defining the physical arrangements of circuits." [REDACTED] at high-level, but not defining it. A small number of documents include screenshots of [REDACTED] that an engineer would not view them as defining the physical arrangement of circuits either.

Micron should have produced all these technical documents relating to the operation of the accused products a long time ago by the deadline for Micron to comply with P.R. 3-4.

Best,
 Yanan

Yanan Zhao
Associate

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 1800 Avenue of the Stars, Suite 900 Los
 Angeles, CA 90067
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From: Park, Ryuk <RPark@winston.com>

Sent: Thursday, July 27, 2023 1:46 PM
To: Zhong, Annita <HZhong@irell.com>; Rueckheim, Mike <MRueckheim@winston.com>; Sheasby, Jason <JSheasby@irell.com>; Zhao, Yanan <yzhao@irell.com>
Cc: Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; Wesley Hill <wh@wsfirm.com>; #Netlist-Micron [Int] <Netlist-Micron@irell.com>; Jennifer Truelove (jtruelove@McKoolSmith.com) <jtruelove@mckoolsmith.com> **Subject:** RE: Lead Counsel Meet and Confer

Annita,
 We have met and conferred with your team several times on this issue and understood that this issue was resolved.

As we've explained earlier, we are entitled to designate as CONFIDENTIAL – OUTSIDE ATTORNEYS ONLY – SOURCE CODE materials that either (1) include "(i) human-readable programming language text that defines or describes the software, firmware, hardware, and circuits (e.g., Verilog and VHDL files) and (ii) files defining the physical arrangements of circuits such as **circuit schematics, layouts, placement and routing information**, netlists, and **layers** (e.g., Graphic Database System (GDS), GDSII stream format, Design Exchange Format (DEF), Library Exchange Format (LEF), and LiveData files)" or (2) "include[] **the text of any comments associated with any of the foregoing, any files containing any of the foregoing, and all directory and folder structures in which such files are maintained.**" See July 17 email from Ryuk Park (citing P.O., Paragraph 8).

Additionally, we re-reviewed the documents on the source code laptop and identified 1 marketing document and 2 (publicly available) JEDEC specifications, which we have agreed to produce. We understand that the remaining documents have either been produced or contain source code, [REDACTED], and were thus made available on the source code laptop. Yanan did not raise any issues with the remaining documents at the time.

Thanks,
 Ryuk

**Ryuk Park
Of Counsel**

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From: Zhong, Annita <HZhong@irell.com>
Sent: Thursday, July 27, 2023 1:08 PM
To: Rueckheim, Mike <MRueckheim@winston.com>; Sheasby, Jason <JSheasby@irell.com>; Zhao, Yanan <yzhao@irell.com>
Cc: Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; Wesley Hill <wh@wsfirm.com>; #Netlist-Micron [Int] <Netlist-Micron@irell.com>; Jennifer Truelove (jtruelove@McKoolSmith.com) <jtruelove@mckoolsmith.com> **Subject:** RE: Lead Counsel Meet and Confer

Micron apparently has treated numerous PowerPoints and PDFs as source code materials simply because they might have contained an image of a circuit. That is improper. Please produce such materials immediately.

Regards,
Annita

H. Annita Zhong Irell &
Manella LLP
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203-7183

From: Zhao, Yanan
Sent: Tuesday, July 18, 2023 10:57 AM
To: Park, Ryuk; Werner, Tom
Cc: Winston-Micron-Netlist; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel; jtruelove@mckoolsmith.com; #Netlist-Micron [Int]
Subject: RE: Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) - Improperly Withheld Documents

Thanks, Ryuk. Can you please identify the file names and/or production bates for those materials you think are properly designated and documents you've already produced, so that we can confirm this resolves our issue?

Yanan Zhao

Associate

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From: Park, Ryuk <RPark@winston.com>
Sent: Tuesday, July 18, 2023 10:37 AM
To: Zhao, Yanan <yzhao@irell.com>; Werner, Tom <TWerner@irell.com>
Cc: Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com; #Netlist-Micron [Int] <Netlist-Micron@irell.com>
Subject: RE: Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) - Improperly Withheld Documents Hi Yanan,

Thanks for your email. We reviewed the materials on the source code laptops and found one marketing document and two JEDEC specifications, which we will produce with a non-source code designation. The other materials on the source code laptop(s) are properly designated or were already produced under a non-source code designation.

Ryuk

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From: Zhao, Yanan <yzhao@irell.com>

Sent: Tuesday, July 18, 2023 9:48 AM

To: Park, Ryuk <RPark@winston.com>; Werner, Tom <TWerner@irell.com>

Cc: Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com; #Netlist-Micron [Int] <Netlist-Micron@irell.com>

Subject: RE: Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) - Improperly Withheld Documents Ryuk,

As explained in more detail by Annita's email on Friday, some of the documents made only available on the source code review computer include

[REDACTED] These documents are not schematics, layouts, and are not "text of any comments associated" with other circuit schematics, layouts, placement, or routing information.

Micron has the burden of proof to show that its designation of any documents as "CONFIDENTIAL – OUTSIDE ATTORNEYS' ONLY – SOURCE CODE" is appropriate and supported by a good faith basis. Please provide a list of the file names and file types that you previously characterized as "Certain technical documentations for HBM2E and HBM3," and explain why you believe they can only be produced as source code.

Best,
Yanan

Yanan Zhao

Associate

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From: Park, Ryuk <RPark@winston.com> **Sent:** Monday, July 17, 2023 8:57 AM **To:** Werner, Tom

<TWerner@irell.com>

Cc: Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com; #Netlist-Micron [Int] <Netlist-Micron@irell.com>

Subject: RE: Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) - Improperly Withheld Documents Tom,

That is categorically false. The documents are properly designated CONFIDENTIAL – OUTSIDE ATTORNEYS' ONLY – SOURCE CODE because they either (1) include "(i) human-readable programming language text that defines or describes the software, firmware, hardware, and circuits (e.g., Verilog and VHDL files) and (ii) files defining the physical arrangements of circuits such as *circuit schematics, layouts, placement and routing information*, netlists, and *layers* (e.g., Graphic Database System (GDS), GDSII stream format, Design Exchange Format (DEF), Library Exchange Format (LEF), and LiveData files)" or (2) "include[] *the text of any comments associated with any of the foregoing, any files containing any of the foregoing, and all directory and folder structures in which such files are maintained.*" P.O., Paragraph 8.

For example, the [REDACTED] which is one of the documents made available for inspection, includes 40+ pages of "semiconductor layouts" and "placement and routing information" and 20+ pages of internal "circuit schematics," both of which are highly sensitive. As another example, the [REDACTED] includes

10+ pages of "circuit schematics, layouts, placement and routing information, ... and layers." Please note that these are just two of the many examples.

That you are unable to identify any specific file or document, despite having had 3 full days to review the documents, speaks volumes about the baselessness of your accusations. If Netlist disagrees with Micron's source code designations, please identify those files or documents with specificity (e.g., provide the file names) and Micron will consider and respond within the 10 days provided under the Protective Order. P.O. Paragraph 18.

Thanks,
Ryuk

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From: Werner, Tom <TWerner@irell.com>

Sent: Friday, July 14, 2023 9:03 AM

To: Park, Ryuk <RPark@winston.com>

Cc: Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; andrea@wsfirm.com ce@wsfirm.com wh@wsfirm.com ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com; #Netlist-Micron [Int]

<Netlist-Micron@irell.com>

Subject: RE: Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) - Improperly Withheld Documents Ryuk,

Please produce all of the third category of documents listed below ("Certain technical documentations for HBM2E and HBM3"). None of them merit a designation under the Protective Order more restrictive than CONFIDENTIAL – ATTORNEYS' EYES ONLY. Please confirm today that they will be produced by Jul 19, 2023, or provide Micron's availability for a L&L M&C.

Very truly yours,
Thomas C. Werner, Esq.
Discovery Counsel

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(he/him/his)

From: Park, Ryuk <RPark@winston.com>

Sent: Thursday, July 6, 2023 4:09 PM

To: Werner, Tom <TWerner@irell.com>

Cc: Winston-Micron-Netlist <Winston-Micron-Netlist@winston.com>; andrea@wsfirm.com; ce@wsfirm.com; wh@wsfirm.com; ~Baxter, Samuel <sbaxter@mckoolsmith.com>; jtruelove@mckoolsmith.com; #Netlist-Micron [Int]

<Netlist-Micron@irell.com>

Subject: RE: Netlist v. Micron, No. 22-cv-203 (E.D. Tex.) - Inspection Tom,

The following materials and source code will be available for inspection next week:

[REDACTED]

A copy of the visitor map for Micron's Boise facilities is attached. Thanks,

Ryuk

Ryuk Park

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